

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	CIVIL ACTION
ASHLEY CATATAO)	NO. 1:22-CV-10620-PBS
)	
Plaintiff,)	
)	
v.)	
)	
SIG SAUER, INC.,)	
)	
Defendant.)	
_____)	

JOINT STATEMENT FOR INITIAL SCHEDULING CONFERENCE

Plaintiff and Defendant submit this joint statement pursuant to Fed. R. Civ. P. 26(f), Local Rule 16.1 and the Court's June 8, 2022 Notice of Scheduling Conference [ECF 13] for the August 8, 2022 Initial Scheduling Conference.

II. ITEMS LISTED IN LOCAL RULE 16.1(d)

As to the items listed in Local Rule 16.1(d):

1. Joint Discovery Plan. A Joint Discovery Plan is set forth in the attached [Proposed] Scheduling Order.
2. Discovery Event Limitations. The parties agree that the limitations on discovery set forth in Local Rule 26.2(c) apply here, but that the deposition limit therein shall apply to fact depositions only, and not to expert depositions or to custodians of records, and that the limitation on document requests applies to the parties themselves and not to document requests to third parties or experts.

3. Schedule for Motions. This is set forth in the attached [Proposed] Scheduling Order, consistent with the sequence set forth in Local Rule 16.1(f).

4. Certifications. The parties will submit their certifications pursuant to Local Rule 16.1(D)(3) separately.

5. Other Procedural Matters: The parties have considered the possibility of phased discovery. Other than the phasing of fact and expert discovery, as included in the [Proposed] Scheduling Order, the parties do not believe that phased discovery will be helpful here.

The parties do not agree to trial by a Magistrate Judge.

Dated: August 1, 2022

By their attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that a true and correct paper copy of the foregoing will be sent those indicated as non-registered participants via first class mail, postage prepaid on this the 1st day of August 2022.

/s/ Richard E. Bennett

Richard E. Bennett